

LOCAL BANKRUPTCY FORM 9013-3

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: : **CHAPTER 13**
DWAYNE LEE CARR :
NIURCA ZENAIDA CARR : **CASE NO. 1:17-bk-00987**
fka Niurca Zenaida Wehler :
Debtor(s) : **ADVERSARY NO.**
Flagstar Bank FSB servicing agent for :
Pingora Loan :
Servicing, LLC : **Nature of Proceeding Motion for relief**
Plaintiff(s)/Movant(s) :
DWAYNE LEE CARR :
NIURCA ZENAIDA CARR :
fka Niurca Zenaida Wehler, :
Defendant(s)/Respondent(s) :
:

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE¹

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance².

Reason for the continuance. Parties need additional time to attempt to resolve the matter

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: April 14, 2020

/s/ Kara K. Gendron

Kara K. Gendron, Esquire
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¹ No alterations or interlineations of this document are permitted.

² If this is not a first request for a continuance, then a Motion to Continue must be filed.

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IN THE MATTER OF : CHAPTER: 13
DWAYNE LEE CARR :
NIURCA ZENAIDA CARR :
Debtor(s) : CASE NUMBER:1:17-bk-00987

CERTIFICATE OF SERVICE

I certify that I am more than 18 years of age and that on April 14, 2020 I served a copy of the Request to Continue on the following parties:

Name and Address	Mode of Service
HYUNDAI MOTOR FINANCE CO BANKRUPTCY DEPARTMENT PO BOX 20809 FOUNTAIN VALLEY, CA 92728	First Class Mail, Postage Prepaid
CHARLES J DEHART, III ESQUIRE 8125 ADAMS DRIVE SUITE A HUMMELSTOWN PA 17036	Electronically
DWAYNE LEE CARR NIURCA ZENAIDA CARR 203 SUNSET DRIVE NEW CUMBERLAND, PA 17070	First Class Mail, Postage Prepaid

I certify under penalty of perjury that the foregoing is true and correct.

Date: 04/14/2020

/s/ Kara K. Gendron
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